

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|---|---|------------------------|
| UNITED UNION OF ROOFERS, |) | CASE NO. 1:13-cv-02115 |
| WATERPROOFERS & ALLIED WORKERS |) | |
| LOCAL UNION NO. 8, Individually and On |) | |
| Behalf Of All Others Similarly Situated, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| GREAT LAKES DREDGE & DOCK |) | |
| CORPORATION, et al., |) | |
| |) | |
| Defendants. |) | |
| <hr/> | | |
| DAVID BOOZER, Individually and On Behalf Of |) | CASE NO. 1:13-cv-02339 |
| All Others Similarly Situated, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| GREAT LAKES DREDGE & DOCK |) | |
| CORPORATION, et al., |) | |
| |) | |
| Defendants. |) | |
| <hr/> | | |
| PATRICK J. CONNORS, Individually and On |) | CASE NO. 1:13-cv-02450 |
| Behalf Of All Others Similarly Situated, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| GREAT LAKES DREDGE & DOCK |) | |
| CORPORATION, et al., |) | |
| |) | |
| Defendants. |) | |
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**DECLARATION OF JOSEPH E. WHITE, III IN SUPPORT OF THE MOTION OF
UNITED UNION OF ROOFERS, WATERPROOFERS & ALLIED WORKERS LOCAL
UNION NO. 8 FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND
APPROVAL OF SELECTION OF COUNSEL**

I, Joseph E. White, III, declare as follows:

1. I am a shareholder of the law firm of Saxena White P.A., counsel for proposed lead plaintiff United Union of Roofers, Waterproofers & Allied Workers Local Union No. 8 (“Movant” or “Local No. 8”). I submit this declaration in support of the motion of Movant for consolidation, for appointment as lead plaintiff, and for approval of its selection of Lead Counsel and Liaison Counsel.
2. Attached hereto as Exhibit A is a copy of a press release published on March 20, 2013 on *Marketwire*, a well-known, national, business-oriented publication, announcing the pendency of the lawsuit against Defendants.
3. Attached hereto as Exhibit B is a true and correct certification of Roy Barnes, on behalf of Local No. 8, setting forth Movant’s transactions in Great Lakes Dredge & Dock Corporation (“Great Lakes” or the “Company”) securities.
4. Attached hereto as Exhibit C is a chart setting forth the losses of Movant in connection with its transactions in Great Lakes securities.
5. Attached hereto as Exhibit D is the firm biography of proposed Lead Counsel Saxena White P.A.
6. Attached hereto as Exhibit E is the firm biography of proposed Liaison Counsel Lasky & Rifkind, LTD.

I declare under penalty of perjury under the laws of the United States that the foregoing facts are true and correct. Executed this 20th day of May, 2013 at Boca Raton, Florida.

/s/ Joseph E. White, III
Joseph E. White, III

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on May 20, 2013, that by filing the Declaration of Joseph E. White, III in Support of the Motion of United Union of Roofers, Waterproofers & Allied Workers Local Union No. 8 for Consolidation, Appointment as Lead Plaintiff, and Approval of Selection of Counsel using the Court's CM/ECF system, he caused true copies to be served on all counsel of record in this case. For the parties in the cases that Plaintiff is requesting be consolidated, service was provided via email to the following counsel:

Louis Carey Ludwig
Patrick Vincent Dahlstrom
POMERANTZ GROSSMAN HUFFORD
DAHLSTROM & GROSS LLP
10 South LaSalle Street, Suite 3505
Chicago, Illinois 60603
(312) 377-1181
Fax: (312) 377-1184
lcludwig@pomlaw.com
pdahlstrom@pomlaw.com

Lionel Z. Glancy
Michael Goldberg
Robert V. Prongay
GLANCY BINKOW & GOLDBERG LLP
1925 Century Park East, Suite 2100
Los Angeles, California 90067
(310) 201-9150
Fax: (310) 201-9160
lglancy@glancylaw.com
mgoldberg@glancylaw.com
rprongay@glancylaw.com

Howard G. Smith
LAW OFFICES OF HOWARD G. SMITH
3070 Bristol Pike, Suite 112
Bensalem, Pennsylvania 19020
(215) 638-4847
Fax: (215) 638-4867
howardsmith@howardsmithlaw.com

/s/ Norman Rifkind